

# Mike Adams Financial Advisors, Inc. Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Mike Adams Financial Advisors, Inc.. If you have any questions about the contents of this brochure, please contact us at (980) 636-4544 or by email at: [fawzi.hyder@mikeadamsadvisors.com](mailto:fawzi.hyder@mikeadamsadvisors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Mike Adams Financial Advisors, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mike Adams Financial Advisors, Inc.'s CRD number is: 323923.*

106 Langtree Village Drive, Suite 301  
Mooresville, NC 28117  
(980) 636-4544  
[fawzi.hyder@mikeadamsadvisors.com](mailto:fawzi.hyder@mikeadamsadvisors.com)  
[www.mikeadamsadvisors.com](http://www.mikeadamsadvisors.com)

*Registration as an investment adviser does not imply a certain level of skill or training.*

Version Date: 03/05/2026

## Item 2: Material Changes

The material changes from the last annual filing of this brochure, submitted on February 27, 2025 are described below. Material changes relate to the firm's policies, practices, conflicts of interest, disciplinary actions, changed financial conditions, or other material changes not specifically described in the Instructions for Form ADV Part 2.

- The Cover Page has been updated to reflect the new office location.
- Item 4 has been updated to disclose a change in Assets Under Management.
- Item 5 has been updated to reflect revisions to the firm's advisory fee schedule.
- Item 12 has been updated to reflect changes to the firm's custodial arrangements, including the removal of Interactive Brokers LLC as a recommended custodian.

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business.....	2
Item 5: Fees and Compensation.....	4
Item 6: Performance-Based Fees and Side-By-Side Management.....	6
Item 7: Types of Clients.....	6
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....	6
Item 9: Disciplinary Information.....	11
Item 10: Other Financial Industry Activities and Affiliations.....	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	12
Item 12: Brokerage Practices.....	13
Item 13: Review of Accounts.....	14
Item 14: Client Referrals and Other Compensation.....	15
Item 15: Custody.....	16
Item 16: Investment Discretion.....	16
Item 17: Voting Client Securities (Proxy Voting).....	16
Item 18: Financial Information.....	16
Item 19: Requirements For State Registered Advisers.....	17

## Item 4: Advisory Business

### A. Description of the Advisory Firm

Mike Adams Financial Advisors, Inc. (hereinafter "Mike Adams") is a Corporation organized in the State of Delaware. The firm was formed in September 2022, and the principal owner is The Mike Adams Group, Inc. Fawzi Jaber Hyder, Rami Massoud, and Salam Serhal are direct owners of The Mike Adams Group, Inc.

### B. Types of Advisory Services

#### *Portfolio Management Services*

Mike Adams offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Mike Adams creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Mike Adams evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Mike Adams will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Mike Adams seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Mike Adams's economic, investment or other financial interests. To meet its fiduciary obligations, Mike Adams attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Mike Adams's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Mike Adams's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

## ***Financial Planning***

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

## ***Services Limited to Specific Types of Investments***

Mike Adams generally limits its investment advice to publicly traded securities, including individual equity and fixed-income securities, mutual funds, and exchange-traded funds (including ETFs that may provide exposure to commodities, precious metals, and cryptocurrencies), as well as non-U.S. securities.

As part of its financial planning services, Mike Adams may provide non-discretionary investment advice regarding private placements, venture capital funds, commodities futures, or other illiquid alternative investments held or considered by clients. Such advice is typically limited to general analysis, risk considerations, and portfolio context, and the firm does not generally manage or directly implement investments in these asset types.

## ***Written Acknowledgement of Fiduciary Status***

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

## **C. Client Tailored Services and Client Imposed Restrictions**

Mike Adams will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Mike Adams on behalf of the client. Mike Adams may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in

investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Mike Adams from properly servicing the client account, or if the restrictions would require Mike Adams to deviate from its standard suite of services, Mike Adams reserves the right to end the relationship.

#### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. Mike Adams does not participate in wrap fee programs.

#### **E. Assets Under Management**

Mike Adams has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$125,206.00	\$0.00	December 2025

### **Item 5: Fees and Compensation**

#### **A. Fee Schedule**

##### *Portfolio Management Fees*

<b>Total Assets Under Management</b>	<b>Annual Fees</b>
\$0 - \$500,000	0.85%
\$500,001 - \$1,000,000	0.80%
\$1,000,001 - \$3,000,000	0.75%
\$3,000,001 - \$10,000,000	0.60%
\$10,000,001 - AND UP	0.50% (negotiable)

Fees for investment advisory services are calculated and paid in arrears on a quarterly basis. The advisory fee is based on the market value of assets under management as of the last business day of the billing quarter, after taking into account any deposits or withdrawals made during that quarter.

Advisory fees are generally negotiable, and the final fee schedule applicable to each client is memorialized in the client's advisory agreement.

Clients may terminate the advisory agreement without penalty and receive a full refund of advisory fees if termination occurs within five business days of signing the investment advisory contract. Thereafter, clients may terminate the agreement generally with thirty (30) days' written notice.

Clients may authorize Mike Adams to deduct advisory fees directly from their accounts held at a qualified custodian. Such authorization is provided in writing and may be revoked by the client at any time.

### **Negotiated Fees, Promotional Rates, and Fee Exceptions**

While Mike Adams maintains standard fee billing practices, advisory fees may be negotiated based on factors such as account size, the scope of services provided, related accounts, anticipated future assets, or other considerations. From time to time, Mike Adams may also offer promotional or discounted fee arrangements to certain clients or groups of clients for a limited period. Any such arrangements are fully disclosed and documented in the applicable client advisory agreement.

In certain circumstances, advisory fees may be reduced or waived, including for accounts of related persons or affiliated entities. As a result, clients with similar account sizes or service arrangements may pay different advisory fees.

### ***Financial Planning Fees***

#### **Hourly Fees**

The negotiated hourly fee for these services is between \$200 and \$300.

Clients may terminate the agreement without penalty, for full refund of Mike Adams's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check, cash and wire.

Hourly financial planning fees are paid in arrears upon completion.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Mike Adams. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

Mike Adams collects its fees in arrears. It does not collect fees in advance.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither Mike Adams nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

Mike Adams does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

Mike Adams generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities

There is no account minimum for any of Mike Adams's services.

## **Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss**

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

Mike Adams's methods of analysis include Cyclical analysis, Fundamental analysis and Modern portfolio theory.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

### *Investment Strategies*

Mike Adams primarily uses long-term investment strategies. In limited circumstances, the firm also employs options strategies, including covered calls, cash-secured puts, protective puts, and long call positions. These strategies are used selectively for income generation, risk management, or defined-risk market exposure. The firm does not engage in uncovered (naked) options strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### *Methods of Analysis*

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio

exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

Mike Adams's use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Options transactions** involve a contract to purchase (call option) or sell (put option) a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. Risks of Specific Securities Utilized**

Mike Adams's use of options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market

is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, cryptocurrencies, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another, and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Real estate funds** (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Venture capital funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Options** are contracts that give the right, but not the obligation, to purchase (call option) or sell (put option) a security at a specified price within a defined period of time. Options may expire worthless if the market price of the underlying security does not move favorably. Options transactions involve certain risks and may not be suitable for all investors. Covered call strategies may limit upside potential in exchange for income generation. Cash-secured put strategies involve the risk of assignment and the obligation to purchase the underlying security at the strike price. Protective put strategies involve the payment of a premium to help limit downside risk but may reduce overall portfolio returns if the option expires without value. Long call positions involve a defined risk limited to the premium paid but may expire worthless. These strategies are used

selectively and are intended for income generation, hedging, or risk-management purposes.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither Mike Adams nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Mike Adams nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Fawzi Hyder is the Assistant Professor of Finance for Lenoir-Rhyne University.

Fawzi Hyder is the President of The Mike Adams Group, Inc.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

Mike Adams does not utilize nor select third-party investment advisers.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

Mike Adams has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Mike Adams's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

Mike Adams seeks to avoid recommending that clients buy or sell any security in which Mike Adams or a related person has a material financial interest. Any such conflicts, if they arise, would be disclosed to clients.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of Mike Adams may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Mike Adams to buy or sell the same securities before or after recommending the same securities to clients, which may result in representatives profiting from the recommendations they provide to clients. Such transactions may create a conflict of interest. Mike Adams maintains policies and procedures designed to identify, document, and address transactions that could be construed as conflicts of interest and seeks to ensure that personal trading does not operate to the client's disadvantage.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of Mike Adams may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Mike Adams to buy or sell securities before or after recommending securities to clients, which may result in representatives profiting from the recommendations they provide. Such transactions may create a conflict of interest; however, Mike Adams maintains policies and procedures designed to manage such conflicts and seeks to ensure that personal trading does not operate to the client's disadvantage.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians and broker-dealers are selected based on Mike Adams's duty to seek best execution, which is the obligation to seek execution of securities transactions for clients on the most favorable terms reasonably available under the circumstances.

In seeking best execution, Mike Adams considers a range of factors, including execution capability, reliability, responsiveness, financial strength, transaction costs and commissions, and the quality of execution-related services provided. Clients will not necessarily pay the lowest commission or commission equivalent, as transactions may be executed through broker-dealers that provide execution quality, trading efficiency, and operational support that Mike Adams believes are in the best interest of clients. Mike Adams does not charge any premium or commission on transactions beyond the actual costs imposed by the broker-dealer or custodian.

Mike Adams generally requires clients to maintain their accounts with Charles Schwab & Co., Inc. (CRD# 5393), except where otherwise agreed in writing.

#### **1. *Research and Other Soft-Dollar Benefits***

Mike Adams does not receive research products or services ("soft-dollar benefits") from broker-dealers or third parties in exchange for client commissions. Mike Adams may, however, receive certain economic benefits from custodians as described in Item 14.

#### **2. *Brokerage for Client Referrals***

Mike Adams does not receive referrals from any broker-dealer or third party in exchange for directing client brokerage transactions.

#### **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

Mike Adams generally requires clients to use a specific broker-dealer or custodian. Clients are advised of this practice in advance and acknowledge this requirement in

the applicable advisory agreement. Not all investment advisers impose such a requirement.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

If Mike Adams buys or sells the same security for more than one client, it may, but is not obligated to, aggregate such transactions in a single order when it believes doing so may result in more favorable prices, reduced transaction costs, or more efficient execution. When transactions are aggregated, trades are allocated among participating client accounts in a fair and equitable manner, generally on a pro-rata basis where practicable.

Mike Adams periodically reviews aggregated transactions to ensure that no client account is systematically disadvantaged by this practice and that allocations remain consistent with its duty to seek best execution.

## **Item 13: Review of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts receiving ongoing investment advisory services are reviewed at least quarterly by Fawzi Hyder, President, with respect to the client's investment objectives, risk tolerance, and overall portfolio composition.

Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Client accounts may be reviewed on a non-periodic basis in response to material market, economic, or political events, or upon changes in a client's financial circumstances, including but not limited to retirement, termination of employment, relocation, or inheritance.

With respect to financial planning engagements, services generally conclude upon delivery of the financial plan unless additional services are requested by the client.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Clients receiving ongoing advisory services receive account statements directly from their qualified custodians at least quarterly. These statements typically include information regarding account holdings, transaction activity, and account value.

When advisory fees are deducted from client accounts, clients may also receive custodial statements or invoices reflecting the fee calculation. Mike Adams may provide clients with

periodic supplemental reports for informational purposes; however, such reports are not intended to replace custodial account statements.

Financial planning clients receive their completed financial plan upon delivery.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Mike Adams does not receive any cash compensation, referral fees, or sales awards from any third party for providing investment advice to clients.

However, Mike Adams receives access to institutional trading and custody services from Charles Schwab & Co., Inc., which are typically not available to retail investors. These benefits are made available to independent investment advisers generally and are not contingent upon the amount of client assets maintained at Schwab or the execution of any specific number of transactions.

Schwab's services include brokerage and custody services related to the execution and settlement of securities transactions, access to research and market information, and access to certain investment products that may otherwise require higher minimum investment thresholds. Schwab generally does not charge separately for custody services and is compensated by account holders through commissions or other transaction-related or asset-based fees associated with securities transactions executed through Schwab or settled into Schwab accounts.

Schwab also makes available to Mike Adams certain products and services that may benefit Mike Adams but do not directly benefit client accounts. These may include educational conferences and events, practice management resources, software and technology that provide access to client account data, trade execution and allocation tools, research and market data, and assistance with compliance, recordkeeping, and client reporting. Schwab may also provide occasional business entertainment, such as meals or event invitations, in connection with educational or professional development activities.

In addition, Schwab Advisor Services may make available services intended to assist Mike Adams in managing and developing its business, including consulting services, publications, conferences, and access to third-party vendors. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a portion of the fees charged by third-party providers.

The availability of these benefits creates a potential conflict of interest in that it provides an incentive for Mike Adams to recommend Schwab as a custodian. Mike Adams believes that Schwab's services and pricing are competitive and consistent with its duty to seek best execution. Clients are not required to maintain accounts at Schwab and may select

another qualified custodian. Mike Adams is independently owned and operated and is not affiliated with Schwab.

### **B. Compensation to Non - Advisory Personnel for Client Referrals**

Mike Adams does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts maintained at the client's qualified custodian, Mike Adams is deemed to have limited custody of client funds solely for the purpose of deducting advisory fees. Mike Adams obtains written authorization from clients permitting such fee deduction.

Client assets are maintained at an independent qualified custodian, which sends account statements directly to clients at least quarterly. Clients also receive statements reflecting advisory fee deductions. Mike Adams does not maintain physical custody of client assets or securities.

Clients are encouraged to carefully review all custodial account statements and any advisory fee calculations for accuracy and to promptly notify Mike Adams of any discrepancies.

## **Item 16: Investment Discretion**

Mike Adams provides both discretionary and non-discretionary investment advisory services to clients. The advisory agreement entered into with each client specifies whether investment discretion has been granted.

Where discretionary authority is granted, Mike Adams is authorized to determine the securities to be bought or sold, the amount of securities to be transacted, the timing of transactions, and the broker or dealer used, without prior consultation with the client. Such discretionary authority may be subject to limitations imposed by the client through investment guidelines, objectives, or other written instructions.

Where investment discretion has not been granted, Mike Adams will not execute transactions without the client's prior approval.

## **Item 17: Voting Client Securities (Proxy Voting)**

Mike Adams will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

Mike Adams neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Mike Adams nor its management has any financial condition that is likely to reasonably impair Mike Adams's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

Mike Adams has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

Mike Adams currently has only one management person: Fawzi Hyder. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

### **C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

Mike Adams does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.